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SUPREME COURT, U. S.

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In the Supreme Court of the United States

OCTOBER TERM, 1968

No. 322

SIMPSON TIMBER COMPANY,
a corporation,

Petitioner,

v.

EZRA PARKS, GRACE LINE, INC., a corporation and BRADY-HAMILTON STEVEDORE CO., a corporation,

Respondents.

PETITION FOR WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE NINTH CIRCUIT

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and Cross-Petitioner
Simpson Timber Company

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INDEX

Page

The Opinions Below, the Jurisdiction of the Court, and the Statement of the Case 2

Questions Presented 2

Reasons for Granting the Writ 2

INDEX OF AUTHORITIES

Case:

Halcyon Lines v. *Haenn Ship Ceiling & Refitting Corp.*, 342 U.S. 282 (1952) 2

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EZRA PARKS,

Petitioner,

v.

SIMPSON TIMBER COMPANY, a corporation,

Respondent and Cross-Petitioner,

and

GRACE LINE, INC., a corporation,

Respondent.

CROSS-PETITION FOR RESPONDENT AND CROSS-PETITIONER SIMPSON TIMBER COMPANY

Cross-Petition for Writ of Certiorari to the United States Court of Appeals for the Ninth Circuit

The respondent and cross-petitioner, Simpson Timber Company, a corporation, respectfully opposes the petition for writ of certiorari filed by petitioner Ezra Parks, and respectfully seeks a writ of certiorari on cross-petition herein to review the judgment of the United States Court of Appeals for the Ninth Circuit, entered in Cause No. 19673.

THE OPINIONS BELOW, THE JURISDICTION OF THE COURT, AND THE STATEMENT OF THE CASE ARE ADEQUATELY PRESENTED IN PETITIONER'S PETITION FOR CERTIORARI

QUESTION PRESENTED

The question presented on this cross-petition is whether or not the Ninth Circuit correctly decided that the manufacturer should not be indemnified by the shipowner or the stevedore.

REASONS FOR GRANTING THE WRIT

The Ninth Circuit Court of Appeals has decided an important question of indemnity law in conflict with the decisions of this Court under the doctrine of *Halcyon Lines* v. *Haenn Ship Ceiling & Refitting Corp.*, 342 U.S. 282 (1952).

Respectfully submitted,

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